

CITY COUNCIL

DAVID P. WARNER, Mayor
PHILLIP A. PENNINO
Mayor Pro Tempore
RAY G. DAVENPORT
STEPHEN J. MANN
JACK A. SIEGLOCK

CITY OF LODI

CITY HALL, 221 WEST PINE STREET
P.O. BOX 3006
LODI, CALIFORNIA 95241-1910
(209) 333-6749
FAX (209) 333-6867

H. DIXON FLYNN
City Manager
JENNIFER M. PERRIN
City Clerk
RANDALL A. HAYS
City Attorney

MAR 26 REC'D

March 21, 1996

Delta Protection Commission
Attention: Margit Aramburu, Executive Director
P.O. Box 530
Walnut Grove, CA 95690


Subject: Proposed Regulation Governing Siting of New Treatment Facilities
and Areas For Disposal of Effluent.

The City of Lodi has the following comment about the proposed regulation governing siting of new treatment facilities and areas of disposal of effluent.

The proposed regulations contain a note at the end of the second paragraph intended to define disposal of effluent. The note states, "disposal includes discharge". This statement implies the commission can prohibit new or increased discharges to the Primary Zone.

The City of Lodi believes regulating effluent discharges is outside the scope of the commission's primary mission to protect land within the Primary Zone. We therefore request this phrase be removed from the proposed regulation.

If you have any questions regarding this comment, please contact either Fran Forkas at (209) 333-6740, or Del Kerlin at (209) 333-6869.



Jack L. Ronsko
Public Works Director

JLR/DK/FF/yc

cc: Water/Wastewater Superintendent
Assistant Wastewater Treatment Superintendent

(61)

MAR 22 REC'D

SOUTH DELTA WATER AGENCY

2509 WEST MARCH LANE, SUITE 200
POST OFFICE BOX 70383
STOCKTON, CALIFORNIA 95267
TELEPHONE (209) 474-2509
FAX (209) 474-9701

Directors:

Jerry Robinson, Chairman
Peter Alvarez, Vice-Chairman
Alex Hildebrand, Secretary
Robert K. Ferguson
Natalino Bacchetti

Counsel:

Brewer, Partridge,
Gerlomes & Herrick
Engineer:
Gerald T. Orlob

March 21, 1996

Ms. Margit Aramburu
Delta Protection Commission
14215 River Road
P. O. Box 530
Walnut Grove, CA 95690

Re: Proposed Regulations Governing Sewage
Treatment Facilities and Disposal of
Biosolids in the Primary Zone of the Delta

Dear Ms. Aramburu:

The South Delta Water Agency supports the proposed regulations which will ban new sewer treatment facilities and the disposal of biosolids in the primary zone of the Delta. The unique soil, hydrology, and biological conditions in the Delta make it unwise to allow these materials to be used, released, or disposed of in the primary zone.

In addition, the Delta acts as a transport facility for the drinking water of approximately 20 million Californians. Since the Delta lands are susceptible to flooding, the use of these materials on the Delta would eventually lead to a catastrophic mixing of drinking water and these substances, which in the normal course of events, would be illegal. Further, the soil, hydrology, and drainage practices of the area would immediately result in a general and steady mixing of these materials with the drinking water.

In further support, numerous state laws recognize the unique value of the Delta and mandate its continued protection.

Ms. Margit Aramburu
Delta Protection Commission
March 21, 1996
Page Two

The South Delta Water Agency strongly urges the Delta Protection Commission to adopt the proposed regulations without any substantive changes.

Very truly yours,

By John Herrick (dd)
JOHN HERRICK, Attorneys for
SOUTH DELTA WATER AGENCY

JH/dd

cc: Mr. Alex Hildebrand
Dante J. Nomellini, Esq.

Dictated by writer signed
in his absence to avoid delay.